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Via ECF and Email (Beckerman.chambers@nysb.uscourts.gov)

The Honorable Lisa G. Beckerman
One Bowling Green
New York, NY 10004-1408
Courtroom: 623

RE: *In re Firstbase.io, Inc.*, Case No. 24-11647 – Request for a Conference on Harbor Compliance’s Intention to File a Motion Seeking Approval of its Combined Disclosure Statement and Proposed Plan

Dear Judge Beckerman,

We write on behalf of Harbor Business Compliance Corporation (“Harbor Compliance”) to request a conference at Your Honor’s earliest availability regarding the above-referenced matter. Pursuant to Your Honor’s Chambers’ Rules, we request a conference to discuss Harbor Compliance’s intention to file a motion seeking approval of its combined disclosure statement and proposed plan (“Combined Disclosure and Plan”).

On May 27, 2025, this Court denied Firstbase.io, Inc.’s (“Debtor”) motion for an extension of its exclusive period to file a plan of reorganization pursuant to 11 U.S.C. § 1121(d)(1). As the Debtor’s exclusive period has lapsed, pursuant to 11 U.S.C. § 1121(c)(2), Harbor Compliance, as a creditor of Debtor, may file its own plan. Harbor Compliance intends to file a combined disclosure statement and chapter 11 plan pursuant to 11 U.S.C. § 105(d)(2)(B)(vi) and General Order M-634 (“General Order”) of the United States Bankruptcy Court for the Southern District of New York.

Pursuant to section (c) the General Order, a plan proponent must request on the docket that the Court hold a conference for the purpose of discussing the plan proponent’s intention to file a motion requesting conditional approval of a combined disclosure statement and chapter 11 plan. Harbor Compliance seeks to file such a motion seeking approval for its Combined Disclosure and Plan to streamline the approval process and reduce the overall cost of reorganization for all parties.



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In addition, pursuant to General Order § (c)(i), Harbor Compliance states as follows regarding its proposed Combined Disclosure and Plan:

- Harbor Compliance will seek to confirm the proposed plan pursuant to 11 U.S.C. § 1129(b) because the proposed plan will provide no recovery for the Debtor's equity and SAFE interests and the holders of such interests will be deemed to have rejected the proposed plan.
- Harbor Compliance will not seek to obtain a consent to the waiver of any right or claim of any party in interest against any non-debtor party or a non-consensual release or injunction of any right or claim of any party in interest against any non-debtor party.
- Harbor Compliance will not seek to provide for treatment under the proposed chapter 11 plan with respect to any class or parties in interest that shall depend on, and differ in accordance with, whether the applicable class or parties in interest vote to accept or reject the plan.
- Harbor Compliance will not seek to settle pursuant to the proposed plan any claims of the debtor's estate against insiders or by insiders against the debtor's estate.
- Harbor Compliance will not seek to settle pursuant to the proposed plan any claims against any third party without such party's consent or with such party's deemed consent.
- Harbor Compliance will seek to expedite or limit the solicitation of acceptance of the plan and/or the notice periods for consideration of the disclosure statement and confirmation of the plan under Fed. R. Bankr. P. 2002 and 3017.
- Harbor Compliance will seek to obtain the Court's conditional approval of the proposed disclosure statement before its service on parties in interest, the solicitation of ballots, and notice of the combined hearing on the proponent's request for final approval of the disclosure statement and confirmation of the chapter 11 plan.

Harbor Compliance respectfully requests a video conference on the record at the Court's earliest convenience to discuss Harbor Compliance's Combined Disclosure Statement and Plan. We thank Your Honor for Your time and attention to this matter.

Respectfully,

/s/ Marc Skapof
Marc Skapof

MS:FHT
cc: all counsel of record via ECF